STATEMENT OF BASIS (AI No. 96336)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0121991 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Amitech America, LTD
Amitech USA - Baton Rouge Facility
18585 Samuels Road
Zachary, LA 70891

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Yvonne Baker

DATE PREPARED: February 22, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits – LAG541066
LPDES permit effective date: March 1, 2003
LPDES permit expiration date: February 29, 2008

LAR05N486
LPDES permit effective date: October 10, 2003
LPDES permit expiration date: April 30, 2006

D. Date Application Received: January 18, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - fiberglass and polymer pipe manufacturing

Amitech USA – Baton Rouge Facility manufactures reinforced plastic composite products including corrosive resistant pipe for use in sewer and wastewater applications. The facility utilizes two process lines: the Flowtite and the Meyer Process Lines.

The Flowtite Process is an open molding process in which the primary polyester resin application technique is filament winding. Filament winding is an automated open molding process that uses a rotating mandrel as the mold. The male mold configuration produces a finished inner surface and a laminate surface on the outside diameter of the product. Filament winding allows for a high degree of fiber lading which provides high tensile strengths in the manufacture of hollow, generally cylindrical products. To achieve the desired pipe properties, isophthalic acid based resins, which have a higher molecular weight than general purpose resins, are used to achieve

greater mechanical and corrosion resistant properties. Because of the higher molecular weight of the polymer, styrene monomer must be added to the resin to bring the resin to a workable viscosity and to provide corrosion properties.

The Meyer Process is designed to produce pipe, junction boxes, and manhole specials for use in the sewer and wastewater applications. The Meyer Process Line includes several different molding processes:

1. Closed pipe molding,
2. Covered-cure slab molding,
3. Open adjustment ring molding, and
4. Manhole benching molding.

Each molding process is performed in batches using a polyester resin. Manhole benching is the only molding process that utilizes vapor-suppressed polyester resin. The remaining processes utilize a similar polyester resin as used in the Flowtite Process Line.

The facility is subject to the Plastics Molding and Forming Point Source Category Effluent Limitation Guidelines (ELG), Subpart C – Finishing Water Subcategory, 40 CFR 463.32.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: III as per LAC33:IX.1319 Table I and SIC 3079. In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 3084 is equivalent to a previous SIC code of 3079
3. Wastewater Type: II
4. SIC code: 3084

C. LOCATION - 18585 Samuels Road in Zachary, East Baton Rouge Parish
Latitude 30°37'31", Longitude 91°14'15"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
Treatment: STP
Location: at the point of discharge from the STP prior to mixing with waters of the state
Flow: less than 25,000 GPD
Discharge Route: via pipe to local drainage thence into Lilly Bayou

Outfall 002

Discharge Type: industrial stormwater and previously monitored cutting tool cooling water, washdown water, and hydrotest water
Treatment: none
Location: at the point of discharge from the retention pond prior to mixing with waters of the state
Flow: intermittent
Discharge Route: via local drainage thence into Lilly Bayou

Outfall 102

Discharge Type: cutting tool cooling water, washdown water, and hydrotest water
Treatment: settling unit
Location: at the point of discharge from the settling unit prior to mixing with waters of the state
Flow: 3350 GPD
Discharge Route: via local drainage thence into Lilly Bayou

4. RECEIVING WATERS

STREAM - local drainage thence Lily Bayou

BASIN AND SEGMENT - Mississippi River Basin, Segment 070502

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 070502, Thompson Creek – Mississippi State Line to Mississippi River Confluence, is listed on LDEQ's Final 2004 303(d) List as impaired for pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Mississippi River Basin, those suspected causes for impairment which are not directly attributed to the fiberglass and polymer pipe manufacturing point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Pathogen indicators can be attributed to discharges of treated sanitary wastewater.

Based on the evaluation of the effluent discharges, it was determined that the facility has the potential to discharge pollutants which may contribute to the pathogen indicators impairment of the receiving waterbody. With this in mind, a limitation for fecal coliform was applied to Outfall 001.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

1. WQMD - There are no open, appealed, or pending OEC enforcement actions as of February 24, 2006.
2. DMR Review/Excursions - A DMR review of Years 2004 and 2005 noted the following excursion:

Date	Parameter	Outfall	Reported Value	Permit Limits
1/1/04	Fecal Coliform	001	770	400

There were no monthly averages noted on the DMRs. The 4th quarter of 2004, 2nd quarter of 2005, 3rd quarter of 2005 and 4th quarter of 2005 were not on file at LDEQ.

8. EXISTING EFFLUENT LIMITS

Outfall 001 – treated sanitary wastewater

Effluent Characteristics	Discharge Limitations		Monitoring Requirements	
	Monthly Average	Weekly Average	Measurement Frequency	Sample Type
Flow - gpd	N/A	Report	1/3 Months	Estimate
BOD5 mg/L	30	45	1/3 Months	Grab
TSS mg/L	30	45	1/3 Months	Grab
Fecal Coliform Colonies/100 ml	200	400	1/3 Months	Grab
pH – allowable Range (standard units)	6.0 (Minimum)	9.0 (Maximum)	1/3 Months	Grab

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070502 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the pallid sturgeon, which is listed as species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated 10/21/05 from Watson (FWS) to Gautreaux (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the pallid sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.
Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Amitech America, LTD

1. **Outfall 001** - treated sanitary wastewater (estimated flow is less than 0.0025 MGD)

Pollutant	Limitation Mo. Avg: Wkly Avg (mg/l)	Reference
Flow (GPD)	Report:Report	LAC 33:IX.2361.I.1.B
BOD_5	30:45	LPDES General Permit LAG540000
Fecal Coliform Colonies/100 ml	200:400	LPDES General Permit LAG540000
TSS	30:45	LPDES General Permit LAG540000
pH	6.0 - 9.0 su	LPDES General Permit LAG540000

Treatment: STP

Monitoring Frequency: 1/quarter for all parameters at the point of discharge from the STP prior to mixing with waters of the state.

Limits Justification: Limits and monitoring frequencies are based on LPDES Class II Sanitary Discharge General Permit (LAG540000) effective March 1, 2003.

2. **Outfall 002** - industrial stormwater and previously monitored cutting tool cooling water, washdown water, and hydrotest water

Pollutant	Limitation Mo. Avg:Daily Max (mg/l)	Reference
Flow (GPD)	Report:Report	LAC 33:IX.2361.I.1.B
TOC	---:50	LPDES General Permit LAR050000
Oil and Grease	---:15	LPDES General Permit LAR050000
pH	6.0 - 9.0 su	40 CFR 463.32

Treatment: none

Monitoring Frequency: 1/month for all parameters at the point of discharge from the retention pond prior to mixing with waters of the state.

Limits Justification: pH is based on the Plastic Molding and Forming Point Source Category Effluent Limitation Guidelines (ELG), Subpart C Finishing Water Subcategory 40 CFR 463.32, Best Practicable Control Technology (BPT). TOC and Oil and Grease are based on LPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities (LAR050000) effective May 1, 2001, Sector Y.

3. **Outfall 102** - cutting tool cooling water, washdown water, and hydrotest water (estimated flow is less than 0.00335 MGD)

Pollutant	Limitation Mo. Avg:Daily Max (mg/L)	Reference
Flow (GPD)	Report:Report	LAC 33:IX.2361.I.1.B
TSS	1.03lbs/day:3.63lbs/day	40 CFR 463.32
Oil and Grease	---:15	LPDES General Permit LAG670000
TOC	---:50	LPDES General Permit LAG670000
COD	---:Report	Similar Discharges

Treatment: none

Monitoring Frequency: 1/month for all parameters at the point of discharge from the settling unit prior to mixing with waters of the state.

Limits Justification: TSS is based on the Plastic Molding and Forming Point Source Category Effluent Limitation Guidelines (ELG), Subpart C Finishing Water Subcategory 40 CFR 463.32, Best Practicable Control Technology (BPT). TOC and Oil and Grease are based on the LPDES General Permit for Hydrostatic Test Wastewater (LAG670000), effective March 1, 2003. COD is based on similar discharges. Monitoring for COD for the life of the permit is included to address high levels reported in the application. Upon renewal a determination will be made on the appropriateness of a permit limitation.

Parameter	Guideline (Daily Maximum)	Guideline (Monthly Average)
TSS	130	37

Calculations

(facility flow) * (ELG) * (conversion factor) = limitation

Daily Maximum Limitations

(0.00335) * (130 mg/L of TSS) * (8.34) = 3.63 TSS

Monthly Average Limitations

(0.00335) * (37 mg/L of TSS) * (8.34) = 1.03 TSS

BPJ Best Professional Judgement
BPT Best Practicable Control Technology
su Standard Units

NOTE
For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2341.B.14.k, stormwater discharges from facilities classified as SIC Code 3084 is considered to be associated with industrial activities. Therefore, an SWP3 is included in the permit.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements for the AI).